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STATE OF NEW JERSEY)
 : ss
COUNTY OF MERCER)

AFFIDAVIT OF
ALPHONSE IANNUZZI, JR.

ALPHONSE IANNUZZI, JR., being duly sworn according to law,
upon his oath deposes and says:

1. I am employed by the Department of Environmental Protection in the Division of Waste Management. I am presently assigned to the Northern Field Office of the Bureau of Field Operations with responsibility for inspecting solid and hazardous waste facilities to determine whether they are complying with State and Federal environmental laws.

2. I hold a Bachelor of Arts Degree in Environmental Science from Stockton State College. In addition, I expect to receive my Masters Degree in Environmental Science from New Jersey Institute of Technology in May 1983.

3. In connection with my duties as a DEP inspector, I have inspected the Scientific Chemical Processing (SCP) facilities located at 216 Paterson Plank Road, Carlstadt, New Jersey (Carlstadt site) and 411 Wilson Avenue, Newark, New Jersey (Newark site).

4. Between January 1981 and January 1983, I inspected the Carlstadt site approximately 15 times. My most recent inspection was conducted on January 12, 1983. A copy of my inspection report is attached hereto as Exhibit "A". During this inspection I observed leaking tanks, drums and tank trailers. In particular, I noted leaks near tanks No. 105, 114 and 118 and around the drum storage area adjacent to tank 105.

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5. During my inspections of the Carlstadt site on March 3, 1982, June 16, 1982 and October 15, 1982 I observed leaks at the same locations as set forth in paragraph 4 above.

6. During my inspection of the Newark site on April 13, 1982 I noted that drums were deteriorating and falling to the ground.

7. In my opinion, the Carlstadt site poses a substantial danger because of the high potential for fire or explosion. The waste in storage tank 105, which has a capacity of approximately 5,000 gallons, is presently corroding directly through the walls and onto the ground. Further, the drums stored near tank 105 are severely rusted. In the event that the waste from these vessels ignited, a chemical fire emanating toxic hazardous fumes would result. Such a fire would endanger those who work and live in the area near this site.

8. Finally, in my opinion the leaks and spills of hazardous substances at the Carlstadt site are causing pollution of the surface and groundwater of the area.

Alphonse J. Iannuzzi, Jr.
Alphonse Iannuzzi, Jr.

Sworn and subscribed to before me
this 18 day of March, 1983.

Rafaela
Rafaela, at the State of New Jersey